

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: **Ebony Staten** : CHAPTER: 13
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DEBTOR : BANKRUPTCY NO.: **18-15944**

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**AMENDED MOTION TO MODIFY
DEBTOR'S CHAPTER 13 PLAN AFTER
CONFIRMATION**

The motion to modify of the above-named Debtors, respectfully represents:

1. This case was commenced by the filing on **September 8, 2018**, a voluntary petition for relief under Chapter 13 of Title 11 of the United States Code.
2. William Miller, Esquire has been appointed Chapter 13 Trustee.
3. Debtor's modified plan was confirmed **May 17, 2019**.
4. Debtor's has paid the sum of **\$3,609.00** into the plan.
5. Debtor requests permission to modify said plan.
6. **Debtor's financial circumstances have been negatively impacted by the uncertainty of the pandemic. Debtor is single parent to four school aged children. Her household expenses increased because children were home from school.**
7. Pursuant to the Cares Act, Debtor proposes to adjust her post confirmation plan payments by adding a term of 24 months unto the end of her confirmed plan.
8. Therefore, Debtor request permission to modify their plan accordingly.

WHEREFORE, Debtor moves that this Honorable Court enter an Order granting Debtor's Motion to Modify Plan Post Confirmation.

\s\ Michael D. Sayles

Date: **August 10, 2020**

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